



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Kendall Green Energy LLC
c/o Sean Caldwell
265 First Street
Cambridge, MA 02142

Re: Kendall Cogeneration Station
NPDES Permit No. MA0004898
Administrative Order Docket No. 11-005

Dear Mr. Caldwell:

Due to delays resulting from a variety of circumstances, Kendall Green Energy LLC ("Kendall Green" or "Company") has requested an extension of the completion date for work under the above referenced Administrative Order ("Order"). In a letter dated October 16, 2014, EPA modified the Company's compliance schedule to require compliance with final permit limits by July 1, 2016. This schedule extension was to provide an opportunity to evaluate keeping in place Steam Turbine Generator #3 and installing a wet cooling tower ("WCT") instead of removing Steam Turbine #3 and installing a Back Pressure Steam Turbine and Air Cooled Condenser ("BPST/ACC"). Due to the extreme snowfall during the winter of 2015 the evaluation took longer than anticipated. During the fall of 2015 a boiler ruptured, releasing large amounts of asbestos into the plant. Asbestos cleanup and repair of the boiler delayed construction work. The project plan called for assessment and refurbishment of Generator #3; the assessment identified significantly more repair work than had been anticipated. Finally, a portion of the construction work required a plant shutdown, which had to be approved by ISO New England. Constraints on the power grid delayed the approved shutdown by a month. The company has completed installation of the BPST/ACC and Generator #3, but now needs more time to complete a testing and commissioning process. During this process the plant will be unable to achieve compliance with the final permit limits. The Company anticipates it will be able to achieve compliance by October 1, 2016.

EPA believes that Kendall Green's proposed schedule change is reasonable and hereby extends the Order's completion milestone until October 1, 2016.

Please telephone George Harding of my staff at (617) 918-1870 or have your attorney contact Jeffrey Kopf, Senior Enforcement Counsel, at (617) 918-1796 if you have any questions.

Sincerely,

Susan Studlien, Director
Office of Environmental Stewardship

cc: Jeff Kopf, Esq., EPA
George Harding, EPA
Daniel J. Mahoney, Esq., Veolia North America
Robert Brown, Esq., MassDEP